

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

ANDERSON ST. JOHN, individually and on behalf
of all others similarly situated,

Plaintiffs,

-against-

ADESA, INC.,

Defendant.

Case No. 2:22-cv-01257-GRB-AYS

NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the accompanying Declaration of Eli Z. Freedberg, executed on August 3, 2022, Declaration of Natalie Murray, executed on July 30, 2022, and the accompanying Memorandum of Law in Support of Defendants' Motion to Dismiss the Complaint, and all other pleadings and filings in this action, Defendant ADESA, Inc. and proposed Defendant ADESA New York, LLC, hereby move the Court before the Honorable Gary R. Brown, United States District Court Judge, at the United States District Courthouse for the Eastern District of New York, located at 100 Federal Plaza, Courtroom 940, at a date and time convenient for the Court, for an Order dismissing with prejudice the claims of Plaintiff Anderson St. John for lack of subject matter jurisdiction pursuant to Rule 12(b)(1) of the Federal Rules of Civil Procedure, together with such other relief as the Court deems just, proper and equitable.

Dated: August 3, 2022
New York, New York

LITTLER MENDELSON, P.C.

By: /s/ Eli Z. Freedberg

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